

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MELVIN NEWSOME, et al.	*	
Plaintiffs,	*	
v.	*	Civil Action No: S01-2257
UP-TO-DATE LAUNDRY, INC., et al.	*	
Defendants.	*	

* * * * *

CONSENT MOTION TO REVISE THE SCHEDULING ORDER

Defendants Up To Date Laundry, Inc., *et al.*, request that the Scheduling Order in this case be revised to postpone the existing discovery and motions deadlines for approximately 30 days. The new deadlines are set forth on the attached proposed Order. In support of this request, Defendants state as follows:

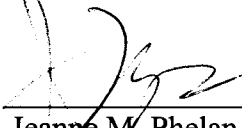
1. The current Scheduling Order sets a discovery deadline of March 17, 2003.
2. The parties have been working diligently to conduct discovery in this case and have completed the bulk of the paper discovery and many of the depositions. The recent inclement weather has significantly interfered with the undersigned's schedule, which was already heavy with depositions in other cases. It has also significantly interfered with the availability of the Defendant corporation's management and staff to participate in and prepare for depositions, because the Defendant's business – supplying clean linen to area hospitals on a “just in time” basis – must operate, regardless of weather and the resulting shortages of staff. The unavailability of Defendant and Defendant's counsel due these obligations and the

unavailability of Plaintiffs' counsel due to other business and appointments have combined to preclude the parties from completing discovery before the expiration of the existing deadline.

3. Counsel for Defendants and Plaintiffs' counsel have discussed extending the discovery deadline by 30 days, and Plaintiffs' counsel have authorized the undersigned to state that they consent to this request.

Accordingly, Defendants request that their motion be granted and that the scheduling order be modified as provided on the attached proposed order to extend the deadlines approximately 30 days.

Respectfully submitted,



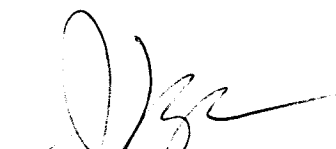
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Attorneys for Defendants,
Up-To-Date Laundry, Inc., *et al.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of March, 2003, a copy of the foregoing Consent Motion to Revise the Scheduling Order was mailed, via first-class U.S. mail, to counsel for Plaintiffs, addressed as follows:

Philip P. Simon
Heller, Huron, Chertkof, Lerner, Simon & Salzman
1730 M Street, N.W., Suite 412
Washington, D.C. 20036



Jeanne M. Phelan

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Civil Action No: S01-2257

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Defendants.

*

* * * * *

ORDER

Upon consideration of the Consent Motion to Revise the Scheduling Order, it is hereby

ORDERED that the motion is granted, and it is also

ORDERED that the Scheduling Order in this case is amended as follows:

Discovery deadline, status report to the
Court, completion of depositions of
statistical experts

April 17, 2003

Motions deadline

May 19, 2003

Date: _____

Frederic N. Smalkin, Judge

cc:

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